
From: John Dubois [mailto:John.Dubois@central-bank.com]
Sent: Tuesday, March 10, 2009 9:17 AM
To: Comments
Subject: RIN 3064-AD35

Sheila Bair
Chairman

Robert Feldman
Executive Secretary

Dear Ms. Bair and Mr. Feldman:

On behalf of Central Bank Illinois, I am deeply concerned about the proposed special assessment to address the current state of the Deposit Insurance Fund of the FDIC. I understand the issues the board of the FDIC is presented with, however, the proposed special assessment, whether it be \$.10 or \$.20 per \$100 of deposits will have a significant adverse affect to our organization and our customer base. The assessment would significantly reduce earnings of our organization which in turn would reduce capital levels and the ability of our bank to effectively leverage that capital into additional lending opportunities. This result would be counterproductive to the current desires of the government to encourage prudent lending. The \$.20 special assessment could reduce our ability to lend by over \$5,000,000. In addition, with the ability to continue to assess special assessments on a periodic basis without further comments, we would need to plan for the worst case scenario on our part for this potential additional costs which would further reduce the funds available to meet the credit needs of our marketplace.

Due to the availability of other sources to meet this unexpected need, such as the use of the FDIC line of credit or debt issuance, I strongly encourage the FDIC to reassess the impact this special assessment would have on the many well capitalized banks throughout the country that serve the financial needs of the marketplace. I would also ask the FDIC reassess their fees associated with the non well capitalized banks and the many recent organizational changes resulting in a significant increase in bank holding company designations and insured deposits and users of the recently approved FDIC and governmental extraordinary programs.

Thank you considering my comments on behalf of Central Bank Illinois with regards to the assessment proposal being considered by the FDIC to meet its needs in the most prudent manner.

Sincerely,

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